

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Chapter 7
Estate of Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO BANK (IRELAND) LTD. (f/k/a
FORTIS PRIME FUND SOLUTIONS BANK
(IRELAND) LIMITED) and ABN AMRO
CUSTODIAL SERVICES (IRELAND) LTD. (f/k/a
FORTIS PRIME FUND SOLUTIONS
CUSTODIAL SERVICES (IRELAND) LTD.),

Defendants.

Adv. Pro. No. 10-05355 (CGM)

**DECLARATION OF REGINA GRIFFIN IN SUPPORT OF
TRUSTEE'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

I, Regina Griffin, declare the following:

1. I am a member of the New York Bar and a partner at Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III, and the chapter 7 estate of Bernard L. Madoff.

2. As an attorney of record in these proceedings, I am fully familiar with the facts set forth herein based either upon my own personal knowledge or upon information conveyed to me.

3. I submit this Declaration in support of the Trustee’s Opposition to the Motion to Dismiss of Defendants ABN AMRO Bank (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Bank (Ireland) Limited) and ABN AMRO Custodial Services (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Custodial Services (Ireland) Ltd.).

4. On February 22, 2019, the Trustee filed a Motion for Leave to File Second Amended Complaint, and attached as an exhibit a copy of the Trustee’s proposed Second Amended Complaint (“PSAC”). *See* ECF No. 165.

5. On June 17, 2022, the Trustee filed his Second Amended Complaint (“SAC”) in this proceeding. *See* ECF No. 205.

6. Attached hereto as **Exhibit 1** is a true and correct copy of a redline comparison of the PSAC and the SAC.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: October 18, 2022
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Regina Griffin
Regina Griffin